

THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
 GENOA COLOR TECHNOLOGIES, LTD.,)
)
)
 Plaintiff,)
)
)
 v.) Civil Action No. 07-CIV-6233 (PKC)(JHP)
)
)
 MITSUBISHI ELECTRIC CORP.;)
 MITSUBISHI ELECTRIC US HOLDINGS, INC.)
 MITSUBISHI ELECTRIC AND)
 ELECTRONICS USA, INC.;) **AFFIDAVIT OF LEE A. GOLDBERG IN**
 MITSUBISHI DIGITAL ELECTRONICS) **SUPPORT OF MOTION TO ADMIT**
 AMERICA, INC.; SAMSUNG) **COUNSEL PRO HAC VICE**
 ELECTRONICS CO., LTD.; SAMSUNG)
 ELECTRONICS AMERICA, INC.)
)
)
 Defendants.)
 -----X

Lee A. Goldberg, being duly sworn, hereby deposes and says as follows:

- 6.24/151 #258-14-07 Jpt
- 1. I am a member of Pearl Cohen Zedek Latzer, LLP, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Sibley P. Reppert as counsel pro hac vice to represent Plaintiff in this matter.
 - 2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in June 1991. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
 - 3. I have known Sibley P. Reppert since 2006.
 - 4. Mr. Reppert is a member of Lahive & Cockfield, LLP in Boston, Massachusetts.
 - 5. I have found Mr. Reppert to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure. Attached hereto as Exhibit 1 is a certificate of good standing of Sibley Reppert.
 - 6. Accordingly, I am pleased to move the admission of Sibley P. Reppert, pro hac vice.

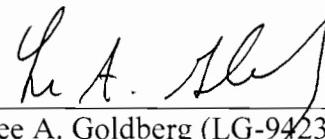
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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
FILED COURT

7. I respectfully submit a proposed order granting the admission of Sibley P. Reppert, pro hac vice, which is attached hereto as Exhibit 2.

WHEREFORE it is respectfully requested that the motion to admit Sibley P. Reppert, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

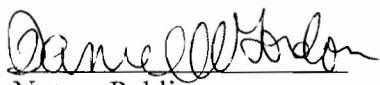
Dated: August 3, 2007

New York, New York



Lee A. Goldberg (LG-9423)

Sworn and subscribed before me this 3rd
day of August, 2007.



Danielle A. Gordon
Notary Public

<p>Danielle A. Gordon Notary Public, State of New York No. 02GO6113460 Qualified in Nassau County Commission Expires August 2, 2008</p>

THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X GENOA COLOR TECHNOLOGIES, LTD.,))) Plaintiff,)) v.)) MITSUBISHI ELECTRIC CORP.;) MITSUBISHI ELECTRIC US HOLDINGS, INC.)) MITSUBISHI ELECTRIC AND) ELECTRONICS USA, INC.;) MOTION TO ADMIT COUNSEL) PRO HAC VICE MITSUBISHI DIGITAL ELECTRONICS) AMERICA, INC.; SAMSUNG) ELECTRONICS CO., LTD.; SAMSUNG) ELECTRONICS AMERICA, INC.))) Defendants. -----X))) Civil Action No. 07-CIV-6233 (PKC)(JHP))))))))))
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PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Lee A. Goldberg a member in good standing of the bar of this Court, hereby move for an Order in the above matter allowing the admission pro hac vice of:

Sibley P. Reppert
 Lahive & Cockfield, LLP
 One Post Office Square
 Boston, MA 02109-2127
 Tel: (617) 994-0830
 Fax: (617) 742-4214

Mr. Reppert is a member in good standing of the Bar of the State of Massachusetts.

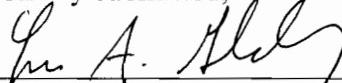
There are no pending disciplinary proceedings against Sibley P. Reppert in any State or Federal court.

In support of this motion and filed concurrently herewith this motion is the Affidavit of Lee A. Goldberg in Support of Motion to Admit Counsel Pro Hac Vice and the Proposed Order for Admission Pro Hac Vice on Written Motion.

Dated: August 3, 2007

New York, New York

Respectfully submitted,



Lee A. Goldberg, Esq. (LG-9423)
Pearl Cohen Zedek Latzer LLP
1500 Broadway, 12th Floor
New York, New York 10036
Tel: (646) 878-0814
Fax: (646) 878-0801

COMMONWEALTH OF MASSACHUSETTS

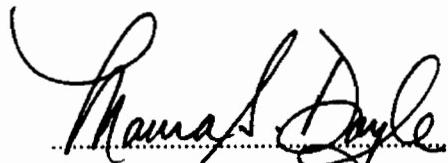
SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston
within and for said County of Suffolk, on the **nineteenth**
day of **December** A.D. **1975**, said Court being the highest
Court of Record in said Commonwealth:

Sibley P. Reppert

being found duly qualified in that behalf, and having taken and subscribed
the oaths required by law, was admitted to practice as an Attorney, and, by
virtue thereof, as a Counsellor at Law, in any of the Courts of the said
Commonwealth: that said Attorney is at present a member of the Bar, and
is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the
seal of said Court, this **nineteenth** day of **July**
in the year of our Lord **two thousand and seven**.



MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

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SOUTHERN DISTRICT OF NEW YORK

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GENOA COLOR TECHNOLOGIES, LTD.,)
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Plaintiff,)
)
v.) Civil Action No. 07-CIV-6233 (PKC)
)
MITSUBISHI ELECTRIC CORP.;)
MITSUBISHI ELECTRIC US HOLDINGS, INC.)	
MITSUBISHI ELECTRIC AND)
ELECTRONICS USA, INC.;) [PROPOSED] ORDER FOR ADMISSION
MITSUBISHI DIGITAL ELECTRONICS) PRO HAC VICE ON WRITTEN MOTION
AMERICA, INC.; SAMSUNG)
ELECTRONICS CO., LTD.; SAMSUNG)
ELECTRONICS AMERICA, INC.)
)
)
Defendants.)
-----X	

Upon the motion of Lee A. Goldberg attorney for Genoa Color Technologies, Ltd. and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Sibley P. Reppert
 Lahive & Cockfield, LLP
 One Post Office Square
 Boston, MA 02109-2127
 Tel: (617) 994-0830
 Fax: (617) 742-4214

is admitted to practice pro hac vice as counsel for Genoa Color Technologies, Ltd. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing

(ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: August 16, 2007

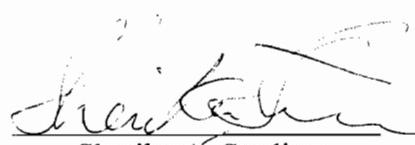
New York, New York

Hon. P. Kevin Castel
U.S.D.J.

CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing **MOTION TO ADMIT COUNSEL PRO HAC VICE, AFFIDAVIT OF LEE A. GOLDBERG IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE and PROPOSED ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION** was made this 16th day of August, 2007, by delivering a true and correct copy of the same by Federal Express Priority Overnight to the following:

1. Vincent J. Belusko
Morrison Foerster
555 West 5th Street
Los Angeles, CA 90013-1024
2. Scott LaScala
Mitsubishi Electric US Holdings, Inc.
Corporate Trust Company
1209 Orange Street
Wilmington, DE 19801
3. Margaret Wilson
CT Corporation
818 W 7th Street
Los Angeles, CA 90017
4. Philip A. Irwin
Covington & Burling LLP
The New York Times Building
620 Eight Avenue
New York, NY 10018



Sherika A. Sterling